

Remarks

Claim 1 has been rejected under 35 U.S.C. § 103(a) as being unpatentable over US Patent No. 6,513,802 to Seger, ("Seger,") in view of US Patent No. 5,775,395 to Wilkins ("Wilkins"). Applicant respectfully requests reconsideration in view of the followings remarks.

Claim 1 describes a vacuum hold-down device comprising a base member and a workpiece support, which cooperate to form a vacuum chamber. The workpiece support further comprises securing means for securing a workpiece thereon. The vacuum in the vacuum chamber is created using pressurized fluid and a venturi having an inlet port, an outlet, and a fluid connection between the low pressure region of the venturi and the vacuum chamber. The device makes it possible to quickly switch between workpiece supports by simply removing the vacuum. This allows multiple workpiece supports to be loaded with workpieces before machining so that there is minimal downtime between batches. When one workpiece support has finished, the vacuum is released and another one is loaded that already has all the workpieces secured.

Seger describes a quick change tooling system for a vacuum holding fixture for a thermoformed part. The system includes a vacuum holding fixture for holding a thermoformed part, the fixture is mechanically attached to an attachment plate. The attachment plate is mechanically fixed to a vacuum box. The fixture is in communication with the vacuum box and holds the thermoformed part via vacuum. The fixture and attachment plate assembly is attached to the vacuum box by a plurality of locking couplers. The couplers comprise a male and a female portion, the male portion having a knob or stud that articulates with the female portion in the vacuum box. The couplers are held in place by locking balls that can be released using pressurized air (emphasis added).

Wilkins describes a vacuum fixture for holding down wood panel workpieces to perform woodworking processes. The fixture comprises a table which includes a vacuum seal at its center, the seal defining a vacuum chamber. There is an orifice within the vacuum chamber that communicates with a venturi vacuum ejector. When pressurized air is introduced into the vacuum ejector and a workpiece is placed over the vacuum seal, a vacuum is created within the

vacuum chamber holding the workpiece to the table. There is no intermediate workpiece support between the table and the workpiece.

The combination of *Seger* and *Wilkins* does not teach the invention of claim 1 or render it obvious. The device of *Seger* uses a vacuum to hold a thermoformed part to a fixture, but the fixture is mechanically attached to the vacuum box via locking couplers. (Col. 3, lines 17-30). The fixture is therefore held to the vacuum box even in the absence of a vacuum. The locking couplers can be released by turning on a compressed air source. This mechanical fixation and the method of release are both in direct contradiction to the invention of claim 1. The invention of claim 1 uses a vacuum to secure the workpiece support to the base member and the release of the workpiece support from the base member is achieved by turning off the compressed air source. On page 2 of the present office action, the Examiner states that *Seger* shows a vacuum hold-down device whereby a base plate 20 and a work support 10 with means for securing a workpiece are held together by vacuum. Applicant respectfully submits that this is not the case for the reasons listed above.

The device of *Wilkins* also uses a vacuum to secure a workpiece. There is no workpiece support, the workpiece is held directly to the base member (table). Therefore, neither *Seger* nor *Wilkins* teaches the use of a vacuum for securing a workpiece support to a base member. Since at least one of the important elements of the invention of claim 1 is lacking in the combination of *Seger* and *Wilkins*, it cannot be considered obvious. Furthermore, neither of the cited references have the capability to prepare multiple workpiece supports with workpieces already secured, before coupling with the base member, in order to minimize machine downtime. *Seger* relies on vacuum to secure the workpiece and *Wilkins* does not even contain a workpiece support.

Applicant respectfully submits that claim 1 is patentable over *Seger* in view of *Wilkins* and requests the withdrawal of the rejection under 35 U.S.C. § 103(a) to claim 1.

Claims 2-3 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over *Seger* in view of *Wilkins* and further in view of US Patent No. 6,857,444 to Davis, herein

after "*Davis*." The combination of *Seger* and *Wilkins* does not teach or render obvious claim 1 for the reasons listed above. Claims 2 and 3 are dependent on claim 1 and are patentable for at least the same reasons as claim 1. Applicant therefore respectfully requests the withdrawal of the 35 U.S.C. § 103(a) rejection of claims 2 and 3.

Reconsideration and reexamination of the application is respectfully requested. Applicant has made a genuine effort to respond to each of the Examiner's objections and rejections in advancing the prosecution of this case. Applicant believes that all formal and substantive requirements for patentability have been met and that this case is in condition for allowance, which action is respectfully requested. If any additional issues need to be resolved, the Examiner is requested to telephone the undersigned at his convenience.

The Petition fee of \$550.00 is being electronically filed herewith. Please charge any additional fees or credit any overpayments as a result of the filing of this paper to our Deposit Account No. 02-3978.

Respectfully submitted,
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